

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Homer R. Daney

Debtor(s)

CHAPTER 13

The Bank of New York Mellon Trust Company, NA, fka
The Bank of New York Trust Company, NA, as
successor to JPMorgan Chase Bank, NA, as trustee, in
trust for the Holders of Truman Mortgage Loan Trust
2002-1, Asset-Backed Certificates, Series 2002-1

Movant

NO. 22-13306 PMM

vs.

Homer R. Daney

Debtor(s)

11 U.S.C. Section 362

Scott F. Waterman

Trustee

**NOTICE OF MOTION, RESPONSE DEADLINE
AND RE-LISTED HEARING DATE**

The Bank of New York Mellon Trust Company, NA, fka The Bank of New York Trust Company, NA, as successor to JPMorgan Chase Bank, NA, as trustee, in trust for the Holders of Truman Mortgage Loan Trust 2002-1, Asset-Backed Certificates, Series 2002-1 has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer, the United States Bankruptcy Judge, in Courtroom 1 at the United States Bankruptcy Court, Office of the Clerk, Room 103, 4th Floor Courtroom, The Gateway Building, 201 Penn Street, Suite 300, Reading, PA 19601 on **September 5, 2023**, at **10:00am** or as soon thereafter as counsel can be heard, to consider the motion.

2. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

3. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed an answer.

August 18, 2023

/s/ Michael P. Farrington, Esquire

Michael P. Farrington, Esquire

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106-1532

(215) 627-1322 FAX (215) 627-7734

Attorney for Movant/Applicant

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Homer R. Daney

Debtor(s)

CHAPTER 13

The Bank of New York Mellon Trust Company, NA, fka
The Bank of New York Trust Company, NA, as
successor to JPMorgan Chase Bank, NA, as trustee, in
trust for the Holders of Truman Mortgage Loan Trust
2002-1, Asset-Backed Certificates, Series 2002-1

Movant

NO. 22-13306 PMM

Vs.

Homer R. Daney

Debtor(s)

11 U.S.C. Section 362

Scott F. Waterman

Trustee

CERTIFICATE OF SERVICE

I, Michael P. Farrington, attorney for The Bank of New York Mellon Trust Company, NA, fka The Bank of New York Trust Company, NA, as successor to JPMorgan Chase Bank, NA, as trustee, in trust for the Holders of Truman Mortgage Loan Trust 2002-1, Asset-Backed Certificates, Series 2002-1 do hereby certify that true and correct copies of the NOTICE OF MOTION, RESPONSE DEADLINE AND RE-LISTED HEARING DATE have been served on August 18, 2023, by first class mail, postage prepaid upon those listed below:

Debtor(s)

Homer R. Daney
510 Nazareth Pike
Nazareth, PA 18064

Attorney for Debtor(s)

JOHN R.K. SOLT
John R. K. Solt, P.C.,
Gateway Professional Center
2045 Westgate Drive, Suite 404B
Bethlehem, PA 18017
VIA ECF

Trustee

Scott F. Waterman
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
VIA ECF

Us Trustee

United States Trustee
Office of United States Trustee
Robert N.C Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107
VIA ECF

/s/ Michael P. Farrington, Esquire

Michael P. Farrington, Esquire
Attorney for Movant/Applicant

Date: August 18, 2023